

IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF GEORGIA
VALDOSTA DIVISION

WOODROW JACKSON,)	
)	
Plaintiff,)	
v.)	
)	CASE NO: 7:24-CV-136-WLS
AUTO-OWNERS)	
INSURANCE COMPANY,)	
)	
Defendant.)	

SWORN DECLARATION OF BRIAN BRADDY, ESQ.

BEFORE ME, the undersigned notary public, this date appeared Brian Braddy, Esq., being personally known to me and having taken oath, deposes and says:

In response to the May 9, 2025 order Plaintiff's counsel became aware of the wrongful citation of cases when Defendant filed a response to Plaintiff's response on April 7, 2025. There were issues with that filing outside of the erroneous sources because the initial document that was filed also had Defense counsel signatures on it. I state this to point out more proof that the document that was filed was not intended to be filed because it had incorrect citations on it as well as other errors that would never be proper for a filing. I am fully responsible for what gets filed on my cases and I take full responsibility for the wrong document being filed. The document that was filed with the incorrect citations and an incorrect signature

block was generated using an artificial intelligence software to get a framework for a response. That document was never intended to be filed and was only to be used as a reference point to have a framework. Plaintiff's counsel had assured defense counsel at that time that he would file the correct motion with updated authorities. However, at that time the correct motion was never filed until the show cause order was issued because all counsel involved in the litigation had agreed to stay discovery pending a decision on Plaintiff's motion to dismiss. It was not until the show cause order was issued that Plaintiff realized that the substitute document with the correct citations was never filed. This overlook is entirely attributable to Plaintiff's counsel and no one else and Plaintiff's counsel accepts full responsibility for the delay in the filing of the correct document and also the erroneous document being filed in the first place.

Plaintiff would respectfully ask that the case not be dismissed, and that Plaintiff not be subject to Rule 11 sanctions because this is a mistake of first instance for Plaintiff's counsel. Throughout the multitude of cases where Plaintiff's counsel has the privilege to represent plaintiffs before this honorable court this has never happened before or in any other court.

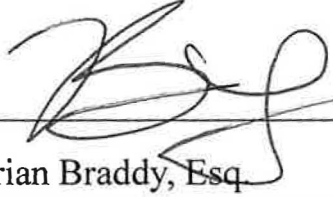
Plaintiff can assure that court and will state before it at the show cause hearing that he will, as required by the Federal Rules of Civil Procedure and the Georgia Rules of Professional Conduct check and assure that every filing that he makes going

forward is reviewed for accuracy, legitimacy and completeness. Plaintiff will also be in attendance in person before this honorable court to answer any questions that your honor may have and again accept full responsibility for the document that was filed, whether in error or not.

Plaintiff's counsel did not intend and would never intend to mislead the Court, Defense counsel or make a mockery of the judicial process. This was a mistake and a mistake of first impression that Plaintiff's counsel will work tirelessly to ensure that it never happens again.

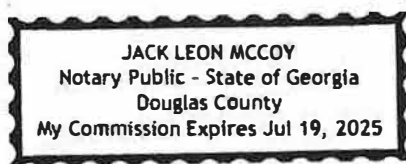
Plaintiff counsel again does not make any excuses and accepts responsibility for the documents that are filed on his account. Plaintiff counsel respectfully requests that the court allows the substitute motion to be filed and reviewed and for the Motion to dismiss to be decided on the merits of the proper filings with the proper cases that have been updated.

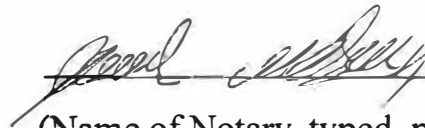
FURTHER AFFIANT SAYETH NOT.



Brian Braddy, Esq.

Sworn to and subscribes before me this 29 day of May 2025, by Brian Braddy, Esq. who presented identification and/or is personally known to me and who did take an oath.





(Name of Notary, typed, printed, or stamped)

Commission no. _____

My Commission expires on: July 19 2025